

STELLA FEY EPLING (SBN 190025)
sfe@northbeachlaw-sf.com
NORTH BEACH LAW
470 Columbus Avenue, Suite 208
P.O. Box 330578
San Francisco, CA 94133
Telephone: 415.433.1448

Attorney for Defendant
ROYAL OAK BAR

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MICHAEL BEAL and ASHLEY
JACKSON,

Plaintiffs,

v.

ROYAL OAK BAR and ARES
PAPAGEORGE,

Defendants.

Case No. 13-04911 LB

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER FOR DISMISSAL WITH
PREJUDICE**

Hon. Laurel Beeler

COUNTERCLAIM

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, and the Parties' September 7, 2016 agreement to settle the matter by mutual dismissals and waiving the provisions of California Civil Code section 1542, as agreed in open Court before the Hon. Maria-Elena James, Magistrate Judge, Plaintiffs MICHAEL BEAL and ASHLEY [JACKSON] BEAL, Defendant ARES PAPAGEORGE, and Defendant THE ROYAL OAK BAR, by and through their respective undersigned attorneys and by ARES PAPAGEORGE on his own behalf, hereby submit the following Stipulation for Dismissal with Prejudice.

1 The Parties deny any liability as to the claims and counter-claims asserted against each
2 other.

3 Each side shall bear its own attorneys' fees and costs.

4 WHEREFORE, the Parties submit to the jurisdiction of this Court to enter an order
5 rescinding the sanctions ordered by the Superior Court of California in the County of San
6 Francisco in this matter on April 17, 2013; and

7 WHEREFORE, the Parties respectfully request this Court to enter an order dismissing the
8 above-captioned matter with prejudice, including all claims, counterclaims and causes of action.

9 IT IS SO STIPULATED.

10 Date: October 20, 2016

NORTH BEACH LAW

11
12 */s/ Stella Fey Epling*

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Stella Fey Epling, Attorney for Defendant
ROYAL OAK BAR

14 Date: October 24, 2016

LAW OFFICES OF JOHN BURRIS

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16 **/s/ DeWitt M. Lacy*

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DeWitt M. Lacy, Attorney for Plaintiffs
*Mr. Lacy has given permission for this
18 document to be electronically filed.

19
20 Date: October 24, 2016

/s/ Ares Papageorge

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Defendant Ares Papageorge, *in propria persona*

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23 All signers have consented to filing of this document with their conformed signatures.

24 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25 Date: October 25, 2016

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HON. LAUREL BEELER
United States Magistrate Judge